



THE CITY OF NEW YORK
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December 21, 2016

VIA ECF

Honorable Kevin Nathaniel Fox
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: James Hurt, Jr. v. City of New York et. al, 15-cv-7612 (PKC)

Your Honor:

I am an attorney in the office of Zachary W. Carter, Corporation Counsel of the City of New York, counsel for defendant City of New York. I write to request an extension of time of approximately two weeks to provide the documents ordered to be produced by December 21, 2016 at the conference held before the Court on December 7, 2016. Plaintiff's counsel does not consent to this request. This is the first request for an extension of this deadline. This request is being made for a number of reasons. First, due to the unanticipated absence of an individual in the Legal Department of the NYPD, it has taken the NYPD longer to provide the photographs of the potential John Doe officers than originally anticipated. I have been advised that the production of these photographs will likely take an additional week. Additionally, the identification and searching of the NYSPIN data, as well as the readying the data for production has taken longer than I estimated. Moreover, as a result of staff vacations related to the holidays, my client has advised me that production of documents will be somewhat slower than usual. I have been advised that the requested NYSPIN data can be produced by January 9, 2017. Finally, I will be out of the city traveling next week. For these reasons, I respectfully request that the production date for the NYSPIN data be extended to January 9, 2017, and the production date for all other documents that were the subject of the conference be extended to January 4, 2017.

Thank you for your attention in this matter.

Respectfully submitted,

/s

Angharad K. Wilson
Assistant Corporation Counsel